

INITIAL STATEMENT OF REASONS
FOR
PROPOSED BUILDING STANDARDS
OF THE
DIVISION OF THE STATE ARCHITECT – STRUCTURAL SAFETY (DSA-SS)

REGARDING THE CALIFORNIA GREEN BUILDING STANDARDS CODE,
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 11

2013 CALIFORNIA GREEN BUILDING STANDARDS CODE

The Administrative Procedure Act requires that an Initial Statement of Reasons be available to the public upon request when rulemaking action is being undertaken. The following information required by the APA pertains to this particular rulemaking action:

STATEMENT OF SPECIFIC PURPOSE, PROBLEM, RATIONALE and BENEFITS:

This proposed action by DSA-SS adopts and amends mandatory and voluntary green building standards for occupancies within its authority. The proposed actions further build upon a framework of voluntary measures adopted by DSA-SS in 2008 and make minor modifications and clarifications to the 2010 code and its recently published supplement, which became effective on July 1, 2012. The intent of the code continues to be: (1) Address the problem of greenhouse gas emissions from buildings; (2) Promote environmentally responsible, cost-effective, healthier places to live and work; and (3) Respond to the directives by the Governor in 2008 to develop a green building code for 2010.

The proposed standards are amendments to Parts 2, 3, 4, 5, and 6 of Title 24 and are being placed into Title 24, Part 11, the California Green Building Standards Code, to provide clarity to users designing or constructing to the green building standards. It is the intent of CBSC to integrate these standards into their respective parts at a future date.

The proposed changes to the building standards with statewide application will lead to substantial environmental benefits through reduction in the use of energy, water, and raw materials; improved public and building occupant health due to improved indoor air quality; and overall reduced detrimental environmental impacts.

Specific Proposed Regulatory Actions: DSA-SS proposes to amend the 2010 California Green Building Standards (*CALGreen* Code) in a new triennial 2013 edition. The rationale for each adoption by chapter, division, and section is listed below. Significant proposals which cut across the entire nonresidential *CALGreen* are:

- To modify the application to include new buildings on an existing site.
- To decrease the adoption of voluntary measures and indicate that the nonresidential voluntary measures can be utilized as a guideline.
- To add two code measures: Section 5.106.4 Bicycle Parking, Section 5.507.4 Acoustical Control.
- To change format, coordinated with the Office of Statewide Planning and Development (OSHPD), to move all of OSHPD's voluntary measures for medical facilities into a single division in Appendix A6.

It is further DSA-SS's intent to provide clarity to the code user in consistent reference nomenclature to other parts of Title 24, for example, the 2013 California Energy Code, which was requested by that agency. Not all such reference changes are shown in the express terms and none is justified below, because they are editorial in nature, having no regulatory effect, and will be coordinated in the codification of the new edition.

CHAPTER 1 -- ADMINISTRATION

101.3.1. State-regulated buildings, structures and applications (Amended)

DSA-SS proposes to amend 101.3.1 to delete a reference to 'as referenced in the Matrix Adoption Tables and to determine a state agency's authority to regulate certain buildings or applications. The problem has been that some code users cite the tables as regulatory indicators of authority, when the tables are meant to be road maps or aids to code use. In addition, the tables frequently contain errors and often are not modified to keep up with code changes. This change is being proposed by DSA-SS and other agencies in all parts of Title 24 with this Chapter 1 language.

105.1.1. Application--Public elementary and secondary schools and community colleges (Amended)

DSA-SS proposes to amend 105.1.1 to require new buildings on existing sites to meet the provisions of the CALGreen Code. This additional requirement for new construction is a logical next step for the type of buildings required to be designed to these sustainability requirements. Additions and alterations are not yet required to meet the CALGreen Code. Notes for existing sites are proposed regarding requirements for site work related to Grading and Paving and Bicycle Parking.

CHAPTER 2 -- DEFINITIONS

202. Definitions (relocated)

DSA-SS is proposing to relocate from individual chapters definitions for terms used in more than one chapter to provide clarity for the code user. Some, such as COOL PAVEMENTS, are being coordinated with the Department of Housing and Community Development (HCD) as they expand the residential provisions to certain additions and high-rise buildings. Others, such as GRAYWATER and RAINWATER, are statutory definitions. There is no construction cost or regulatory effect from the adoption of these clarifying definitions. DSA is also proposing to adopt any definitions that were not previously adopted; thus, matching CBSC's list throughout this code.

NOTE: DSA has withdrawn the definition for Time Dependent Valuation (TDV) Energy as they are being adopted by the California Energy Code. Also the Water Budget definition has been modified. These changes were made after the Green Building code advisory committee (CAC) which met on August 8, 2012.

CHAPTER 3 -- GREEN BUILDING

306. [DSA-SS] VOLUNTARY MEASURES (amended)

306.1 Purpose (amended)

306.1.1 (amended)

306.1.2 (adopted)

DSA-SS proposes to amend 306, 306.1, 306.1.1 and adopt 306.1.2 as DSA proposes to decrease the adoption of voluntary measures with exception of commissioning, testing and adjustment, and acoustical control. Instead, the DSA-SS will encourage public schools and community colleges to use the nonresidential voluntary measures as a guideline for green building standards that exceed the code. This is due to public comments made in May 2011 by stakeholders (Coalition for Adequate Student Housing) at the Green Building Code Advisory Commission meeting that the voluntary code for schools and community colleges should be a guideline. This allows for all the voluntary measures and their tiers to be open for implementation. *Refer to the statement of reasons under Appendix A5 of this ISOR for additional information.*

CHAPTER 4 -- RESIDENTIAL MANDATORY MEASURES

DSA-SS is not proposing adoption of Chapter 4.

CHAPTER 5 -- NONRESIDENTIAL MANDATORY MEASURES

DIVISION 5.1 -- PLANNING AND DESIGN

5.101.1 Scope (amended)

DSA-SS proposes to amend the title of 5.101.1 from Purpose to 'Scope'.

5.106.4.2 Bicycle parking (adopt)

5.106.4.2.1 Short-Term bicycle parking (adopt)

5.106.4.2.2 Long-Term bicycle parking (adopt)

DSA-SS proposes to adopt 5.106.4.2, 5.106.4.2.1 and 5.106.4.2.2 code measures for Public Schools and Community Colleges. Bicycle transportation provides an alternative to vehicular use which creates environmental advantages. Changing rooms are not required in this particular code provision. Bicycle racks (short-term parking) are generally included in any school or college program planning; and although there is a cost associated with implementing the long-term bicycle parking regulations, the impact is minimal when compared to the overall construction cost.

The benefits of implementing a bicycle parking regulation would promote bicycle ridership, with the resulting benefits:

- Reducing the number of vehicles from the roadways and therefore reducing greenhouse gas emissions.
- Also, such a regulation would promote some indirect benefits such as biking, running, walking and other forms of aerobic exercising during breaks or during the lunch hour which would promote health and wellness.
- The health benefits both mental and physical of riding a bicycle and other forms of exercise are well documented and could reduce health-related costs borne by business owners.

These, along with increased employee and student productivity, clearly outweigh the insignificant cost associated with implementing such a regulation.

5.106.8 Light pollution reduction [N] (amended)

DSA-SS proposes to adopt the acronym 'N'. Becoming mandatory on July 1, 2012, this section is being modified to indicate its applicability only to newly constructed projects, limiting the scope of this new standard as code users get used to it. It is also being updated to reflect the correct name of its referenced standard, IES TM-15-11, to provide clarity.

Table 5.106.8 Maximum Allowable Backlight, Uplight and Glare (BUG) Ratings (amend)

DSA-SS proposes to amend the Matrix Adoption Table by adding Table 5.106.8 to the Matrix Adoption Table for clarity and format consistency. DSA-SS is not proposing any adoption, amendment or repeal for Table 5.106.8.

5.106.8.1 Effective Date (Repeal)

DSA-SS proposes to repeal 5.106.8.1 because this date expired and no longer applies.

DIVISION 5.2 -- ENERGY EFFICIENCY

DSA-SS is not proposing any adoption, amendment or repeal to Division 5.2.

DIVISION 5.3 - WATER EFFICIENCY AND CONSERVATION

5.302.1 Definitions (repeal/relocate)

DSA-SS proposes to repeal 5.302.1 definitions and has relocated definitions to Chapter 2 for terms used in more than one chapter to provide clarity for the code user.

Section 5.303.2 Water Reduction savings (amended title for 20% savings) & Tables (amended)

DSA is proposing modifying Table 5.303.2.3 to eliminate the mandatory 20% reduction for a nonresidential lavatory faucet. Set at 0.5 gpm, currently this is the lowest flow rate available without use of special aerators or other devices. A coordinated proposal omits the footnote concerning use of aerators to achieve 0.4 gpm or lower. These changes are intended to assist code users with compliance until lower-flow faucet technology is developed and readily available. The related footnote is moved to the voluntary table in Appendix A5 for 30% or greater water use reduction; a new footnote is added in coordination with HCD.

CAC Recommendation: The Green Building code advisory committee (CAC) met on August 8, 2012. During their meeting the committee voted to Further Study and recommended clarification and alignment with HCD language. DSA concurred with the CAC recommendation and has re-named the Section 5.303.2 and added new code sections for high efficiency fixtures as per code section 5.303.3. Additionally, DSA proposes to further modify tables 5.303.2.2 to update the flow rates as per new section 5.303.3. Table 5.303.2.3 is being repealed and a new table created to remove the fixtures that are covered in new section 5.303.3.

5.303.2.1 Multiple showerheads serving one shower (amended/renumbered)

DSA-SS proposes to renumber 5.303.2.1 as 5.303.2.2 and amend this provision to clarify that; when a shower is served by more than one '*newly installed*' showerhead, the combined flow rate of all the showerheads controlled by a single valve shall not exceed the maximum flow rate.

Table 5.303.2.3 Fixture Flow Rates (amended)

DSA-SS proposes to amend Table 5.303.2.3 to eliminate the mandatory 20% reduction for a nonresidential lavatory faucet. Set at 0.5 gpm, currently this is the lowest flow rate available without use of special aerators or other devices. A coordinated proposal omits the footnote concerning use of aerators to achieve 0.4 gpm or lower. These changes are intended to assist code users with compliance until lower-flow faucet technology is developed and readily available. The footnote is moved to the voluntary table in Appendix A5 for 30% or greater water use reduction.

5.303.4 Wastewater reduction [N] (amended)

DSA-SS proposes to adopt the acronym 'N' to designate "new" construction.

5.303.6 Standards for plumbing fixtures and fittings (amended)

DSA-SS proposes to amend 5.303.6 to meet the current standards of the California Plumbing Code.

5.303.6 Plumbing fixtures and fittings and Table 5.303.6. DSA, in coordination with CBSC and HCD, proposes to eliminate the standards table here and make reference to the appropriate locations where standards are found for clarity for the code user.

DIVISION 5.4 -- MATERIAL CONSERVATION AND RESOURCE EFFICIENCY

5.407.2.2 Entries and openings (amended)

5.407.2.2.1 Exterior door protection (adopted)

5.407.2.2.2 Flashing (adopted)

DSA-SS proposes to amend 5.407.2.2 and adopt 5.407.2.2.1 and 5.407.2.2.2 for coordination with HCD's residential provisions as recommended by Air Resources Board (ARB) staff. It clarifies for the code user what is required without the use of explanatory notes.

5.408.1 Construction waste management (amended)

5.408.1.1 Construction waste management plan (amended)

5.408.1.2 Waste management company (amended)

DSA-SS proposes to amend 5.408.1 and subsections (5.408.1.1 and 5.408.1.2) to add demolition waste diversion of 50% for nonresidential projects as promulgated by CBSC and HCD.

- Interested parties such as CARB, which includes demolition waste in its estimate of greenhouse gas reduction from the mandatory code, and StopWaste.org have long requested that CBSC include demolition waste. And, in the early development of mandatory standards for the 2010 *CALGreen* Code, CBSC staff based its cost/benefit analysis on combined construction and demolition (C&D) waste. It found a relatively modest cost of on a small nonresidential project for a detailed C&D plan to be projected at less than 1% of construction cost, and the same for larger projects. However, because all mandatory provisions were applicable to newly constructed projects, CBSC did not include demolition waste in its 50% diversion requirements although HCD always has.

5.408.2 Isolated jobsites (repealed)

DSA-SS proposes to repeal 5.408.2 because this language is not incorporated into Section 5.408.1. Matrix Adoption Table is renumbered to reflect repeal of 5.408.2.

5.410.1 Recycling by occupants (amended)

DSA-SS proposes to amend 5.410.1.1 to modify this section to recognize that stricter local recycling ordinances may apply, and to clarify for the code user how this section would be triggered for a building alteration or addition, as required elsewhere in law.

CAC Recommendation: The Green Building code advisory committee (CAC) met on August 8, 2012. During their meeting the committee voted to Further Study to clarify language. CBSC concurred with the CAC recommendation. Upon further study CBSC has clarified the language by removing the requirements for alterations and added an exception for tenants occupied spaces.

5.410.1.1 Sample ordinance (renumbered)

DSA-SS proposes to renumber 5.410.1 as 5.410.1.2.

DIVISION 5.5 -- ENVIRONMENTAL QUALITY

DSA-SS proposes that most of the changes proposed for this division resulted from comments received from CARB. They are intended to provide clarity and accuracy for the code user, ratcheting up the compliance levels for resilient flooring now possible because of availability and economy of products, and adding a new section for mandatory refrigeration system leak reduction for large supermarkets.

5.502.1 Definitions (adopted)

DSA-SS proposes to adopt new definitions in 5.502.1 which are added that provide clarity to the code user in the interpretation of the new mandatory refrigeration system leak reduction measures. New definitions proposed for adoption are: BTU/HOUR; Chlorofluorocarbon (CFC); Global Warming Potential (GWP); Global Warming Potential Value (GWP VALUE); Halon; High-GWP Refrigerant; Long Radius Elbow; Low-DWP Refrigerant; PSIG; Schrader Access Valves; Short Radius Elbow; and Supermarket.

5.504.3 Matrix Adoption Table (amended)

5.504.4 (Matrix Adoption Table (amended)

DSA-SS proposes to amend the Matrix Adoption Table to include 'and subsections' to 5.504.3 and 5.504.4 (remove 5.504.1, Table 5.504.4.1 & 5.504.4.2, 5.504.3, 5.504.3.1, Table 5.504.4.3 & .504.3.2 as these are now included by adding the words 'and subsections to 5.504.4) for format and consistency with the format in Matrix Adopt Tables. No new changes are proposed.

Section 5.504.4.4 Carpet systems. (amended)

DSA is proposing to make editorial changes to existing language to clarify the requirements as per the recommendations by CHPS letter dated August 24, 2012 and coordinating with Resilient flooring systems.

NOTE: This code change was done after the Green Building code advisory committee (CAC) met on August 8, 2012.

5.504.4.5 Composite wood products (amended)

Table 5.504.4.5 Formaldehyde Limits (amended)

DSA-SS proposes to amend 5.504.5 and Table 5.504.4.5 by updating the referenced standards as suggested by CARB to their current limits of compliance. On July 1, 2012, the last of the phased limits kicked in and now all subject materials must comply. This is primarily a formatting improvement for clarity for the code user.

5.504.4.6 Resilient flooring systems (amended)

DSA-SS is proposing updating the compliance level suggested by CARB from 50 percent to 80 percent of floor area receiving resilient flooring. In its request to make this standard more stringent, CARB staff contacted several large flooring manufacturers for availability of product meeting one or more of the referenced standards. In follow-up, CBSC staff was able to corroborate the preliminary information that CARB staff had gathered.

- Most manufacturers canvassed indicated at least 90 percent of their product is FloorScore certified and/or is tested to meet the CDPH Standard Method, Version 1.1, with one large manufacturer not reporting a percentage. That particular manufacturer has a reported product line of 10 categories that are FloorScore certified. Staff received assurance that more product is being tested and certified all the time, because manufacturers are finding that the public is demanding low VOC flooring.
- Staff looked at the issue of certified product cost and found a mixed bag that showed a tendency for thinner, lower quality flooring with no or very limited warranties not to be certified or to be cheaper than the tested/certified equivalent. Higher end, thicker, longer-warranted flooring is comparable in cost, with instances of the certified product's being less expensive. Since most commercial projects designers will opt for durable furnishings, it would appear that the cost should not be a factor in requiring 80 percent compliance for nonresidential.

NOTE: DSA is proposing to make editorial changes to existing language to clarify the requirements as per the recommendations by CHPS letter dated August 24, 2012 and coordinating with Carpet systems. This code change was done after the Green Building code advisory committee (CAC) met on August 8, 2012.

5.504.5.3 Filters (adopted)

5.504.5.3.1 Labeling (adopted)

DSA-SS proposes to adopt 5.504.5.3 and 5.504.5.3.1 in response to comment, rewording an exception for certain ductless HVAC equipment which is incompatible with the MERV 8 filter requirement, but which is highly efficient and provides other benefits to a building operator. The new language is intended to provide clarity to the code user in determining the class of equipment which qualifies for the exemption and what filter rating is permissible. The labeling requirement for MERV filter ratings is proposed in coordination with standards proposed by HCD.

5.507 Environmental Comfort (adopted)

5.507.4 Acoustical control (adopted)

5.507.4.1 Exterior noise transmission, prescriptive method (adopted)

5.507.4.1.1 Noise exposure where noise contours are not readily available (adopted)

5.507.4.2 Performance method (adopted)

5.507.4.2.1 Site features (adopted)

5.507.4.2.2 Documentation of compliance (adopted)

5.507.4.3 Interior sound transmission (adopted)

DSA-SS proposes to adopt 5.507 through 5.507.4.3 that public schools and community colleges are required to design and plan spaces with good acoustics. This is generally requested by the facility planners and is known to enhance student learning. Promulgated by the CBSC, cost information on exterior walls meeting the requirement for at least STC 50 includes:

- Many common exterior wall assemblies meet the STC 50 rating; it is simply a matter of choosing one to meet the STC 50 or better, resulting in no extra cost.
- Specifying STC 30 windows may or may not add cost depending on the quality of the windows, allowing choices that could result in no extra cost.
- For interior party walls with an STC rating of 50, this can be achieved with a sound assembly using resilient channels, which CBSC learned would cost about 15% more than a similar assembly with no sound rating. After public comment from industry representatives, CBSC has lowered the rating to 40, which is more readily achievable than 50 and should be adequate for commercial application. If the walls in question have a fire rating, most assemblies exceed 40. STC 50 is largely dependent on staggered studs and resilient channels, and is required primarily in multi-family housing, where people need privacy and quiet for rest and relaxation.

- Any other method of achieving the required STC is allowable provided it is shown to achieve the required rating.

These are no- or low-cost requirements that would provide a positive health and psychological impact on building occupants subject to the provisions of these sections. The provisions potentially save employers, the state, and health insurer's money through healthy work and student attendance, increased productivity, and better learning environments.

The Building Standards Green Building Code Advisory Committee (GBCAC), on August 8, 2012, requested further study on Section 5.507 and its subsections, Acoustical Control. The GBCAC was unclear why the voluntary measure A5.507 was not adopted rather than this mandatory section 5.507. The DSA-SS has proposed to adopt the mandatory measure acoustical control rather than the voluntary measure to avoid the cost implications of probable consultants required to accomplish the design criteria of Section A5.507. To address the concerns of the GBCAC, the DSA-SS has proposed to leave the Voluntary measure A5.507 in the Appendix. Refer to the statement of reasons under Appendix A5 of this ISOR for additional information.

DIVISION 5.7 – ADDITIONS AND ALTERATIONS TO EXISTING NONRESIDENTIAL BUILDINGS

DSA-SS is not proposing adoption of Division 5.7.

CHAPTER 6 -- REFERENCED ORGANIZATIONS AND STANDARDS (amended)

DSA-SS proposes to amend the standards table in 601.1 to provide clarity to the code user regarding an IES standard which has been added as a reference elsewhere. This proposal also repeals the following organizations from the table: AABC, NEBB, and TABB. New or renumbered section references have been included in this table to coordinate with sections adopted by DSA-SS. On further study, requested by the *Building Standards Green Building Code Advisory Committee (GBCAC), on August 8, 2012* these deletions proved unnecessary.

CHAPTER 7 -- INSTALLER AND SPECIAL INSPECTOR QUALIFICATIONS

Proposed at the *Building Standards Green Building Code Advisory Committee (GBCAC), on August 8, 2012*, a supplement modification to the 45-day Express Term, DSA-SS is proposing to repeal 702.2 (Special inspection) and 703.1 (Documentation) for clarity and to avoid confusion and ambiguity in the field for DSA Inspectors.

CHAPTER 8 -- COMPLIANCE FORMS AND WORKSHEETS

WS 1 Baseline Water Use (amended)

WS 2 Reduction Water Use Calculation Table (amended)

WS 3 30%, 35%, 40% Reduction Water use Calculation Table (amended)

DSA-SS proposes modification of the Water Use Worksheets to provide clarity to the code user on proper flow rates, and conform Worksheets WS-2 and WS-3 to the omission of nonresidential lavatory faucets from the 20% reduction requirement. This action is proposed in coordination with those in Division A5.3 for 30% savings.

DIVISION A4 -- RESIDENTIAL VOLUNTARY MEASURES

DSA-SS is not proposing adoption of Division A4.

CHAPTER A5 – NONRESIDENTIAL VOLUNTARY MEASURES

The Building Standards Green Building Code Advisory Committee (GBCAC), on August 8, 2012, requested further study on Appendix Chapter A5 - Nonresidential Voluntary Measures, because it was unclear why the appendices were proposed to be repealed. For clarity, this portion of the ISOR includes the changes requested by the committee and by public comment as follows:

In response to comments submitted at the Building Standards Green Building Code Advisory Committee meeting on April 5, 2011, the DSA is repealing the majority of the voluntary measures previously adopted. The Coalition of Adequate School Housing (CASH) opposed the use of a "voluntary code" for schools and

suggested the use of the appendix as a guideline. Further discussion with stakeholders revealed that the availability of the entire appendix would provide the opportunity for schools and community colleges to utilize the tiers. As a result, the Appendix Chapter 5, in its entirety, is proposed to be repealed and made available to be utilized as a guideline as indicated in the proposed language revisions to Section 306, now titled Voluntary Measures and *CALGreen* Tier 1 and *CALGreen* Tier 2.

Additionally, public comments by the BGCAC on August 8, 2012, revealed that the Appendix A5 would be an incomplete guideline for Public Schools and Community Colleges without: commission, testing and adjusting and reach standards for acoustical control. Therefore, DSA is proposing that the following three sections remain as DSA-SS voluntary measures:

- Commission (Section A5.410.3) and
- Testing and Adjustment (Section A5.410.4)
- Acoustical Control (Section A5.507.5)

DIVISION A5.1 -- PLANNING AND DESIGN (repealed)

DSA-SS proposes to repeal (decease) the “adoption” of voluntary measures in Division A5.1. As proposed in Section 306.1, the DSA-SS will encourage public schools and community colleges to use the nonresidential voluntary measures as a guideline.

DIVISION A5.2 – ENERGY EFFICIENCY (repealed)

DSA-SS proposes to repeal (decease) the “adoption” of voluntary measures in Division A5.2. As proposed in Section 306.1, the DSA-SS will encourage public schools and community colleges to use the nonresidential voluntary measures as a guideline.

DIVISION A5.3 – WATER EFFICIENCY AND CONSERVATION (repealed)

DSA-SS proposes to repeal (decease) the “adoption” of voluntary measures in Division A5.3. As proposed in Section 306., the DSA-SS will encourage public schools and community colleges to use the nonresidential voluntary measures as a guideline.

DIVISION A5.4 – MATERIAL CONSERVATION AND RESOURCE EFFICIENCY (portions repealed)

DSA-SS proposes to repeal (decease) the “adoption” of voluntary measures in Division A5.4 except Sections A5.4.10.3 and its subsections (Commissioning) and A5.4.10.4 and its subsections (Testing and adjustment). As proposed in Section 306.1, the DSA-SS will encourage public schools and community colleges to use the nonresidential voluntary measures as a guideline.

DIVISION A5.5 – ENVIRONMENTAL QUALITY (portions repealed)

DSA-SS proposes to repeal (decease) the “adoption” of voluntary measures in Division A5.5 except Section A5.507.5 (Acoustical Control). As proposed in Section 306.1, the DSA-SS will encourage public schools and community colleges to use the nonresidential voluntary measures as a guideline.

DIVISION A5.6 – VOLUNTARY TIERS

DSA-SS is not proposing adoption of Division A5.6.

APPENDIX A6 – REFERENCED STANDARDS

DSA-SS is not proposing adoption of Appendix A6.

TECHNICAL, THEORETICAL, AND EMPIRICAL STUDY, REPORT, OR SIMILAR DOCUMENTS

No technical, theoretical, or empirical studies or reports were used, as Section 18928 of the Health & Safety Code mandates this proposed action.

STATEMENT OF JUSTIFICATION FOR PRESCRIPTIVE STANDARDS:

No new prescriptive standards are proposed.

CONSIDERATION OF RESONABLE ALTERNATIVES

The Division of the State Architect has not considered any reasonable alternatives to the proposed action, as this action is required by law.

REASONABLE ALTERNATIVES THE AGENCY HAS IDENTIFIED THAT WOULD LESSEN ANY ADVERSE IMPACT ON SMALL BUSINESS

The Division of the State Architect has not identified any reasonable alternatives to the proposed action, and no adverse impact to small business due to these proposed changes is expected.

FACTS, EVIDENCE, DOCUMENTS, TESTIMONY, OR OTHER EVIDENCE OF NO SIGNIFICANT ADVERSE ECONOMIC IMPACT ON BUSINESS

The Division of the State Architect has no evidence indicating any potential significant adverse impact on business with regard to the proposed action.

DUPLICATION OR CONFLICTS WITH FEDERAL REGULATIONS

The proposed regulations do not duplicate or conflict with federal regulations.